From: <u>Grossman, Lenny</u>
To: <u>Jackson, Suzanne</u>

Subject: FW: LEAF -- Letter from Region 2 to Puerto Rico regarding use of LEAF for potential beneficial use evaluation

**Date:** Monday, February 10, 2014 11:44:14 AM

From: Lenny Grossman [mailto:Grossman.Lenny@epamail.epa.gov]

Sent: Monday, February 10, 2014 11:31 AM

To: Grossman, Lenny

Subject: Fw: LEAF -- Letter from Region 2 to Puerto Rico regarding use of LEAF for potential beneficial

use evaluation

---- Forwarded by Lenny Grossman/R2/USEPA/US on 02/10/2014 11:30 AM -----

From: Susan Thorneloe/RTP/USEPA/US To: Lenny Grossman/R2/USEPA/US@EPA

Cc: helms.greg@epa.gov, mckinney.douglas@epa.gov, lenox.carol@epa.gov

Date: 12/06/2010 01:35 PM

Subject: Re: LEAF -- Letter from Region 2 to Puerto Rico regarding use of LEAF for potential beneficial use evaluation

Look at the 2nd paragraph (the green text is what I am suggesting). U.S. FOIA Exempt (b) (5)

I hope this helps!

Kind regards-

Susan T.

Lenny Grossman---12/06/2010 01:08:53 PM---The EQB beneficial use determination is based on Agremax not exceeding the RCRA toxicity characteris

From: Lenny Grossman/R2/USEPA/US To: Susan Thorneloe/RTP/USEPA/US@EPA Date: 12/06/2010 01:08 PM

Subject: LEAF

The EQB beneficial use determination is based on Agremax not exceeding the RCRA toxicity characteristic for heavy metals, as detailed in a 2007 study and report by the Puerto Rico legislature which concluded that Agremax was non-toxic and thus appropriate for beneficial reuse. However, it should be noted that the use of the RCRA toxicity characteristic leaching procedure to evaluate the potential for environmental release of heavy metals from coal combustion residues has been criticized by the EPA Science Advisory Board and the National Academy of Sciences. In response, EPA has selected the leaching environmental

assessment framework (LEAF), under which it has developed four new test methods that are planned to be incorporated into the <u>EPA SW-846 Test Methods for Evaluating Solid Wastes</u>, to be used where the RCRA toxicity characteristic leaching procedure is not required or best suited (e.g., in the assessment of materials for beneficial reuse).

